

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JACOB KOLONIS

Criminal No. *20-146*  
(18 U.S.C. §§ 875(d), 2251(a) and (e),  
2252(a)(2) and (b)(1) and 1470)

[UNDER SEAL]

INDICTMENT

COUNT ONE

The grand jury charges:

In and around August of 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly transmitted in interstate and foreign commerce, a communication containing a threat to injure the reputation of K.W., a minor female known to the grand jury, with intent to extort from K.W. any thing of value.

In violation of Title 18, United States Code, Section 875(d).

**FILED**

JUL - 8 2020

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

**COUNT TWO**

The grand jury further charges:

In and around August of 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly transmitted in interstate and foreign commerce, a communication containing a threat to injure the reputation of K.S., a minor female known to the grand jury, with intent to extort from S.S. any thing of value.

In violation of Title 18, United States Code, Section 875(d).

**COUNT THREE**

The grand jury further charges:

In and around August of 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly transmitted in interstate and foreign commerce, a communication containing a threat to injure the reputation of A.H., a minor female known to the grand jury, with intent to extort from A.H. any thing of value.

In violation of Title 18, United States Code, Section 875(d).

**COUNT FOUR**

The grand jury further charges:

In and around August of 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly transmitted in interstate and foreign commerce, a communication containing a threat to injure the reputation of A.L., a minor female known to the grand jury, with intent to extort from A.L. any thing of value.

In violation of Title 18, United States Code, Section 875(d).

**COUNT FIVE**

The grand jury further charges:

On or about November 22, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly attempted to and did employ, use, persuade, induce, entice, and coerce J.S., then a resident of Ohio and a minor female known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit live visual depictions of J.S. engaged in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, knowing or having reason to know that said visual depictions would be transported and transmitted using any means or facility of interstate and foreign commerce, and said visual depictions were transported and transmitted using any means and facility of interstate commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT SIX**

The grand jury further charges:

On or about November 22, 2019, in the Western District of Pennsylvania, the defendant JACOB KOLONIS, did knowingly receive and attempt to receive a visual depiction, namely, live visual depictions of J.S., then a resident of Ohio and a minor female known to the grand jury, the production of which involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depicted a minor engaging in sexually explicit conduct, from J.S., and said visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT SEVEN**

The grand jury further charges:

On or about November 22, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly transmitted in interstate and foreign commerce, a communication containing a threat to injure the reputation of J.S. with intent to extort from J.S. any thing of value.

In violation of Title 18, United States Code, Section 875(d).

**COUNT EIGHT**

The grand jury further charges:

On or about November 22, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, using a means and facility of interstate and foreign commerce, did knowingly transfer, and attempt to transfer, obscene matter to another individual who had not attained the age of 16 years, that is, J.S., a minor female known to the grand jury, knowing that J.S. had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.



**COUNT NINE**

The grand jury further charges:

On or about November 28, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly attempted to and did employ, use, persuade, induce, entice, and coerce J.D., then a resident of Ohio and a minor female known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit live visual depictions of J.D. engaged in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, knowing or having reason to know that said visual depictions would be transported and transmitted using any means or facility of interstate and foreign commerce, and said visual depictions were transported and transmitted using any means and facility of interstate commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT TEN**

The grand jury further charges:

On or about November 28, 2019, in the Western District of Pennsylvania, the defendant JACOB KOLONIS, did knowingly receive and attempt to receive a visual depiction, namely, live visual depictions of J.D., then a resident of Ohio and a minor female known to the grand jury, the production of which involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depicted a minor engaging in sexually explicit conduct, from J.D., and said visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT ELEVEN**

The grand jury further charges:

On or about November 28, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly transmitted in interstate and foreign commerce, a communication containing a threat to injure the reputation of J.D. with intent to extort from J.D. any thing of value.

In violation of Title 18, United States Code, Section 875(d).

**COUNT TWELVE**

The grand jury further charges:

On or about November 28, 2019, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, using a means and facility of interstate and foreign commerce, did knowingly transfer, and attempt to transfer, obscene matter to another individual who had not attained the age of 16 years, that is, J.D., a minor female known to the grand jury, knowing that J.D. had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

**COUNT THIRTEEN**

The grand jury further charges:

From on or about February 5, 2020 until on or about February 7, 2020, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly attempted to and did employ, use, persuade, induce, entice, and coerce C.C., then a resident of Pennsylvania and a minor female known to the grand jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit live visual depictions of C.C. engaged in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, knowing or having reason to know that said visual depictions would be transported and transmitted using any means or facility of interstate and foreign commerce, and said visual depictions were transported and transmitted using any means and facility of interstate commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT FOURTEEN**

The grand jury further charges:

From on or about February 5, 2020 until on or about February 7, 2020, in the Western District of Pennsylvania, the defendant JACOB KOLONIS, did knowingly receive and attempt to receive a visual depiction, namely, live visual depictions of C.C., then a resident of Pennsylvania and a minor female known to the grand jury, the production of which involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depicted a minor engaging in sexually explicit conduct, from C.C., and said visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT FIFTEEN**

The grand jury further charges:

From on or about February 5, 2020 until on or about February 7, 2020, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, knowingly transmitted in interstate and foreign commerce, a communication containing a threat to injure the reputation of C.C. with intent to extort from C.C. any thing of value.

In violation of Title 18, United States Code, Section 875(d).

**COUNT SIXTEEN**

The grand jury further charges:

From on or about February 5, 2020 until on or about February 7, 2020, in the Western District of Pennsylvania and elsewhere, the defendant, JACOB KOLONIS, using a means and facility of interstate and foreign commerce, did knowingly transfer, and attempt to transfer, obscene matter to another individual who had not attained the age of 16 years, that is, C.C., a minor female known to the grand jury, knowing that C.C. had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.



**FORFEITURE ALLEGATION**

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to defendant JACOB KOLONIS that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Sections 2253 and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction under Counts One through Fourteen of this Indictment.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of any of the offenses set forth in Counts Five, Nine, and Thirteen of this Indictment, in violation of Title 18, United States Code, Section 2251, and as set forth in Counts Six, Ten, and Fourteen of this Indictment, in violation of Title 18, United States Code, Section 2252, the defendant, JACOB KOLONIS, shall forfeit to the United States of America:

a. Any visual depiction described in Title 18, United States Code, Section 2251, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

3. Pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), upon conviction of any of the offenses set forth in Counts One, Two, Three, Four, Seven, Eleven, and Fifteen of this Indictment, in violation of Title 18, United States Code, Section 875, the defendant, JACOB KOLONIS, shall forfeit to the United States of America

any property, real or personal, constituting or derived from proceeds traceable to a violation of Title 18, United States Code, Section 875.

4. Pursuant to Title 18, United States Code, Section 1467, upon conviction of any of the offenses set forth in Counts Eight, Twelve, and Sixteen, in violation of Title 18, United States Code, Section 1470, the defendant, JACOB KOLONIS, shall forfeit to the United States any obscene material produced, transported, mailed, shipped, or received and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses of conviction.

5. If any of the property described above, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and Title 28, United States Code, Section 2461(c).

A True Bill,

A handwritten signature in black ink, appearing to read "Mimi Carterman", written over a horizontal line.

FOREPERSON

A handwritten signature in black ink, appearing to read "Scott Brady", written over a horizontal line.

SCOTT W. BRADY  
United States Attorney  
PA ID No. 88352